

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:)	Chapter 11
)	Case No. 25-10068 (CTG)
JOANN INC., <i>et al.</i> , ¹)	(Jointly Administered)
)	
Debtors.)	
)Objection Deadline: April 29, 2025 at 4:00 p.m.
)Hearing Date: May 6, 2025 at 1:00 p.m.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT the undersigned counsel has filed the Motion of OOCL USA Inc., *et al.* for Relief from the Automatic Stay of 11 U.S.C. § 362 or to compel abandonment and to deem certain goods abandoned pursuant to 11 U.S.C. § 554 (the “Motion”).

PLEASE TAKE FURTHER NOTICE THAT if you wish to respond to the Motion, you are required to file such response **on or before April 29, 2025 at 4:00 p.m. prevailing Eastern time** (the “Objection Deadline”).

At the same time, you must serve a copy of such response on the undersigned counsel so as to be received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be held **May 6, 2025, at 1:00 p.m. prevailing Eastern time** before the Honorable Craig T. Goldblatt, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent order may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security agreement.

[SIGNATURE ON NEXT PAGE]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Dated: April 8, 2025
Wilmington, Delaware

HOGAN MCDANIEL

By: /s/ Daniel C. Kerrick
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